REMARKS

This amendment is in response to the Examiner's Office Action dated 11/10/2004. Reconsideration of this application is respectfully requested in view of the foregoing amendment and the remarks that follow. Applicant wishes to note that claims 1, 9, and 10 have been amended without adding new matter. Additionally, as per the examiner's suggestion, the specification has been amended without adding new matter. Applicant respectfully requests the examiner to withdraw the objections with respect to the specification.

STATUS OF CLAIMS

Claims 1-19 are pending.

Claims 1-19 stand rejected under 35 U.S.C. § 102(a) as being anticipated by Caronni et al. (USP 6049878).

OVERVIEW OF CLAIMED INVENTION

The presently claimed invention provides for a multicast system capable of reducing a load on an operator of a center system for multicasting data. The multicast system comprises a client and a center system connected via a network. The client includes a data transmission module for transmitting data to be multicast to the center system and a destination information notifying module for notifying the center system of destination information on a plurality of transmission destinations for the data to be multicast. The center system includes a receiving module for receiving data and destination information, a generating module for generating a multicast group containing a plurality of transmission destinations on the basis of received destination information, and a multicast module for multicasting data to the generated multicast group.

The present invention also provides for a multicast group generating method comprising the steps of notifying a center system of data that a client desires to multicast and of destination information on a plurality of transmission destinations, receiving data and destination information, and generating a multicast group containing the plurality of transmission destinations by the center system.

In the Claims

Claims 1, 9, and 10 have been amended to clarify the present invention. Applicant wishes to note that no new matter was added via the current amendment.

REJECTIONS UNDER 35 U.S.C. § 102(a)

Claims 1-19 stand rejected under 35 U.S.C. § 102(a) as being anticipated by Caronni et al. (USP 6049878). To be properly rejected under 35 U.S.C. §102(a), each and every element of the claims must be disclosed in a single cited reference. The applicant, however, contends that the presently claimed invention cannot be anticipated in view of the Caronni reference.

The Caronni reference teaches a secure multicast system that includes a sending entity (i.e., sender **100** of figure 1) having a sending multicast application and a receiving entity (i.e., receiver **101** of figure 1) having a receiving multicast application. The problem of the prior art addressed by Caronni involves the need for a multicast system that solves "scalability failures" in "multicast security protocols" (see column 3, lines 1-11 of Caronni). In an extended embodiment of Caronni, as shown in figure 3, a "central access control entity **302**" is disclosed

to handle "group key management and admission control and encryption" (see column 5, lines 50-54 of the Caronni).

Independent claim 1, on the other hand, provides a center system (connected with a client over a network) that comprises: (a) a receiving module for receiving data and destination information; (b) a generating module for generating a multicast group containing data to be multicast and destination information; and (c) a multicast module for multicasting the data to the plurality of transmission destinations in the generated multicast group. Independent claims 5 and 16 of the present invention teach a method of a center system receiving data and destination information and generating a multicast group containing the plurality of transmission destinations. The center system of applicant's invention addresses the prior art's inability to multicast without prior registration, an issue that is neither explicitly nor implicitly addressed in the Caronni reference.

The examiner, on page 3 of the office action, equates applicant's center system and the functionality of applicant's center system to element **302** of figure 3 of the Caronni patent. As mentioned earlier, Caronni's figure 3 teaches an extended embodiment wherein a "central access control entity **302**" is disclosed to handle "group key management and admission control and encryption" (see column 5, lines 50-54 of the Caronni). Applicant contends that the "central access control entity **302**" of Caronni is merely used to manage secret keys and encryption and fails to provide many of the limitations of applicant's center system. For example, there is no teaching in Caronni for "central access control entity **302**" to receive data (to be multicast) and destination information for such data, to generate a multicast group containing data to be

multicast and destination information, and to multicast the data to the plurality of transmission destinations in the generated multicast group.

Additionally, applicant wishes to note that the office action is not specific with respect to what elements of the Caronni reference equate to the receiving module, the generating module, and the multicast module of independent claim 1. The examiner on page 3 of the office action summarily states that the "center access control entity **302**" provides for all the limitations of applicant's "center system" without providing any specific details regarding anticipation of each element of applicant's "center system" (i.e., the receiving module, the generating module, and the multicast module). Similarly, the examiner has not provided specific details with respect to independent claims 5 and 16. If the examiner still feels that such limitations are disclosed in the Caronni reference, applicant respectfully reminds the examiner that it is the duty of the examiner to specifically point out each and every limitation of a claim being rejected as per §1.104(c)(2) of Title 37 of the Code of Federal Regulations and section 707 of the M.P.E.P., which explicitly states that "the particular part relied on must be designated" and "the pertinence of each reference, if not apparent, must be clearly explained and each rejected claim specified".

Applicant wishes to note that the above-mentioned arguments regarding applicant's center system substantially apply to independent claim 9. Additionally, the examiner appears to equate the group key manager module and the receiver multicast application of Caronni to provide for many of the limitations of applicant's claim 9. However, applicant wishes to reemphasize that neither the two modules nor the entire Caronni reference teaches the feature of receiving data (that should be multicast) and destination information on a plurality of transmission destinations of the data from a client over a network.

The above-presented arguments substantially apply for dependent claims 2-4, 6-8, 10-15, and 17-19 as they inherit all the limitations of the claim from which they depend. Furthermore, with respect to claims 2, 6, and 17, applicant wishes to note that column 14, lines 7-10 of the Caronni reference discloses that "a group key management component coupled to the traffic distribution component" has "a data structure for storing an ID for each participant in the virtual multicasting group." The data structure represents the group key. Hence, applicant contends that the Caronni reference fails to teach or suggest a destination information module that notifies a center system of the destination information on a plurality of destinations selected by the user from a list.

Applicant also wishes to state for the record that the art of "IP multicasting" is such that each of the clients participates in a multicast group and sends multicast data. Additionally, in the art of multicasting, whether or not each client participates in the multicast group depends on the client. Applicant contends that neither the cited art nor the art of IP multicasting teaches a process whereby each client selects a plurality of transmission destinations.

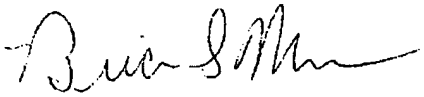
SUMMARY

As has been detailed above, none of the references, cited or applied, provide for the specific claimed details of applicant's presently claimed invention, nor renders them obvious. It is believed that this case is in condition for allowance and reconsideration thereof and early issuance is respectfully requested.

This amendment has been filed with a petition for extension of time. The Commissioner is hereby authorized to charge the petition fee, as well as any deficiencies in the fees provided to Deposit Account No. 50-1290.

If it is felt that an interview would expedite prosecution of this application, please do not hesitate to contact applicant's representative at the below number.

Respectfully submitted,



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